ATTACHMENT B

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

ALEXANDER AND SUSAN PROUT, as parents, next friends and legal guardians of F.P., a minor,))))
Plaintiffs,	Civil Action No. 1:16-CV-00225-PB
)
V.)
ST. PAUL'S SCHOOL,)
Defendant.)
)

STIPULATION AND AGREEMENT

1	_ (the "Non-Party"), a non-party in the above-
captioned action, has been served with a subpoe	ena herein. Compliance with such discovery
requests will require	to disclose confidential information as set
forth in Paragraph 3 of the Protective Order entered in this action.	

2. The Non-Party requests that he/she/it, as the case may be, be afforded the protections of the Protective Order entered in this action and agrees that it shall abide by all of the terms of the Protective Order, and, upon notice, any further Order of the Court modifying or superseding the terms of the Protective Order, as if it were a party to this action. The parties to this Stipulation and Agreement agree that the parties to this action may use documents and information designated by the Non-Party as "CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER" under the terms of this Protective Order in depositions of third-party witnesses in this action, so long as, with respect to each deposition in which such documents are used, the third-party witness:

ATTACHMENT B

- is an individual referenced in the document(s), an expert as defined by Subsection 5(B)(5) of the Protective Order, an author, addressee, or lawful recipient of the document(s); or an individual for whom counsel for Plaintiffs or the Defendant in this action believes in good faith previously received or had access to the document(s), unless the person indicates that he or she did not have access to the document(s); or other persons by written consent of the Non-Party or upon order of the Court and on such conditions as may be agreed or ordered; AND
- (b) first executes the Acknowledgement and Agreement to Be Bound, attached as Exhibit A to this Protective Order.
- 3. This Stipulation and Agreement is not intended to and should not be relied upon by any signatory or party in the above-captioned action to support any motion or request for a district court other than the district court in the place of compliance to hear or adjudicate any Subpoenarelated motion under Rule 45.

provid	ied in the Flotective Order.
provid	led in the Protective Order:
inform	nation shall be designated "CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER" as
4.	The parties hereby stipulate and agree that the following categories of documents and

The identification of these categories of documents and information in no way limits the ability of the non-party to designate other or additional categories of documents and information "CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER" consistent with the terms of the Protective Order.

Case 1:16-cv-00225-PB Document 39-1 Filed 11/15/17 Page 3 of 3

ATTACHMENT B

Dated:	
	Counsel for Defendant
Dated:	
	Counsel for Plaintiffs
Dated:	
	Counsel for [Non-Party]